

October 31, 2018

Mr. Andy Schweitzer  
Pennsylvania Department of Environmental Protection, Air Quality  
Northeast Regional Office  
2 Public Square  
Wilkes-Barre, PA 18711-0790

**RE: Annual Report for Reporting Period: August 2, 2017 – August 1, 2018**  
**as required under 40 Code of Federal Regulations Part 60, Subpart OOOOa**

Dear Mr. Schweitzer:

As required under the provisions of 40 Code of Federal Regulations (CFR), Part 60, Subpart OOOOa, Cabot Oil & Gas Corporation (Cabot) is submitting this Annual Report for the Reporting Period of August 2, 2017 through August 1, 2018.

This submittal will satisfy the notification and reporting requirements as mandated under §60.5420a(b)(1)-(11). Please note that because of the potential changes being contemplated for OOOOa, EPA Region 3 has suggested that reports be submitted in hardcopy. Therefore, Cabot is submitting this report in electronic (via e-mail) and printed form.

**General Information**

The general information required under §60.5420a(b)(1)(i) – (iv) is as follows:

Owner and Operator:	Cabot Oil & Gas Corporation
Address:	2000 Park Lane, Suite 300 Pittsburgh, PA 15275
Affected Facilities:	See Attachments A and B
Reporting Period:	August 2, 2017 through August 1, 2018
Technical Contact:	Mr. Bart Roberts Senior EHS Specialist (412) 249-3889 <a href="mailto:Bart.Roberts@cabotog.com">Bart.Roberts@cabotog.com</a>

## Annual Report

The enclosed attachments contain all data elements as required under §60.5420a(b)(1)(i)-(iv) for the associated facilities:

- Attachment A: Well Completion Operations (§60.5420a(b)(2)(i)-(ii))
- Attachment B: Collection of Fugitive Emissions (§60.5420a(b)(7)(i)-(xii))

Cabot has operated all subject gas wells in accordance with applicable Quad Oa requirements during the subject reporting year with the exceptions noted below:

Wellsite Identification	Regulatory Requirement	Deviation Description
JHHC Pad 1	Conduct monitoring survey of the collection of fugitive emissions components at the wellsite within a company-defined area at least semi-annually after the initial survey and at least four months apart; and maintain records for at least five years (§60.5397a(f-g) and §60.5420a(c))	Failure to conduct a semi-annual survey
Bistis, M. Pad 1	Maintain records for at least five years (§60.5420a(c)) and consecutive semi-annual monitoring surveys must be conducted at least 4 months apart (§60.5397a(g)(1))	Failure to maintain records of a semi-annual survey and survey performed within 4 months of previous survey
Abbott, D. Pad 2	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Arnone, J. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Bolcato, G. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Diaz Family LP Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Ferguson, A. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Halliday, A. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Housenick, J. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Howell, G. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Jeffers Farms Pad 5	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Kropa, T. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Lambert, R. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Petersen, H. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Reynen, J. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey
Wright, W. Pad 1	Maintain records for at least five years (§60.5420a(c))	Failure to maintain records of a semi-annual survey

For JHHC Pad 1, the first semi-annual survey was conducted in a timely manner; however, the second semi-annual survey was inadvertently omitted from the monthly schedule due to a breakdown in Cabot's internal controls and, therefore, not performed.

For the remaining wellsites identified in the table above, the initial surveys were conducted within 60 days of the startup of production. Additionally, the semi-annual surveys were conducted at the required frequencies following the previous surveys, and at least 4 months apart. However, field data for the semi-annual surveys conducted at these wellsites, which were electronically uploaded to our data collection system, were inadvertently deleted and cannot be recovered. While date and time stamps of these inspections were documented, the uploaded field data and pictures were not recoverable. Consequently, although documentation from the field inspectors demonstrates the required inspections were performed as required, the survey data and information have been deleted and therefore Cabot is submitting these occurrences as deviations from the monitoring plan.

Also, for the Bistis, M. Pad 1, the semi-annual survey on February 20, 2018, was performed 62 days after the previous survey, which was therefore within 4 months of the previous survey.

### **Corrective Measures**

Upon discovery, Cabot promptly conducted an LDAR survey on 10/25/2018 at the JHHC Pad 1 due to the omission detailed above at this facility; this data has been included with this report.

In an effort to establish a properly documented baseline, Cabot will perform, as soon as practicable, an off-cycle round of LDAR surveys of the fugitive emissions components at the affected facilities identified in the table above. Should leaks be detected, they will be promptly repaired and a follow-up survey will be performed to demonstrate the effectiveness of the repair. In fact, Cabot has already begun this work by performing surveys at several of the affected locations in October.

Following the off-cycle survey, Cabot will submit a supplemental report for the 2017-2018 report year to the Pennsylvania Department of Environmental Protection.

Further, Cabot is also reviewing its internal compliance notification, performance, and documentation system to ensure that future compliance is attained. Over the past couple years, Cabot has been building-out an electronic data collection system and the preparation of this report has brought to light some deficiencies. We believe these software "bugs" have now been addressed, however, the deviations here have identified the need for additional oversight and redundancy in this part of Cabot's compliance program. Due to the inherent complexities of the Quad Oa requirements, coupled with the large number of Cabot-owned affected facilities, Cabot will be initiating routine internal reviews, coupled with audits of its electronic database system. This should minimize the potential for any non-conformances and any deviations discovered should be able to be corrected within applicable compliance windows. Note, however, that the issues described in this report were discovered after the 2018-2019 reporting year had begun and, consequently, while not currently anticipated, these same issues may affect compliance for the beginning of the 2018-2019 filing year.

Should you have any questions regarding this filing, please contact Mr. Bart Roberts using the contact information above.

*I hereby certify that based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.*

Sincerely,



John J. Smelko

Manager, Environmental & Regulatory Compliance – North Region

cc     Natalia Vazquez  
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Houston Files (Cabot)  
James Edwards (Cabot)  
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